

Brian Quiros

From: Tisa, Kimberly
Sent: Thursday, December 15, 2016 8:42 AM
To: Mike Zarba
Cc: Doubleday, Edward; Trombly, Gary; Tisa, Kimberly
Subject: RE: EPA Comments on submitted work plan documents for Century Enterprise Center PCB-related activities

Mike:

As we discussed yesterday, the Town is proposing to modify its existing plan for the concrete floor and for the sand located in the pits. Removal of the ≥ 50 ppm PCB-contaminated areas (*PCB remediation waste*), and removal of the expansion joint tar (*PCB bulk product waste*) will be conducted as originally proposed.

- Following this work, in lieu of the proposed milling and verification sampling, the Town is proposing to remove the remaining concrete slab in its entirety and dispose as a < 50 ppm *PCB remediation waste*.
- In addition, the Town is proposing to collect samples of the sand in the pits to determine disposal requirements. Two samples from each up to 58 samples locations (total of 116 samples) will be collected. Originally, all sand was to be disposed as a > 50 ppm PCB waste.
- As the concrete pad will be removed, verification of the underlying soil is proposed on a 50-foot sampling grid (3-6" depth) with exception of specific, targeted locations where smaller grids are proposed (Page 8, Section 3.1.3). In addition, in the former lumber storage and box shop, following slab removal, samples will be collected on a 10-foot grid for a total of 98 grab samples.

The Town has proposed the modification to its plan in accordance with Attachment 1, Condition 17 to the Approval dated September 1, 2015. Based on EPA's review of the proposed plan, we provide the following:

1. Removal of the concrete slab in lieu of sampling with disposal as a < 50 ppm PCB remediation waste (following removal of the specific areas and materials to be disposed as a PCB bulk product waste and ≥ 50 ppm PCB remediation waste) would be authorized under 40 CFR § 761.61(a)(5)(i)(B)(2)(ii) to a state-permitted non-hazardous waste landfill. Thus, EPA has no further comments on this proposed approach for the concrete.
2. For the sand, the proposed additional sampling appears reasonable. EPA is requiring submittal of the sample analytical data for its review to support the disposal of this waste type.
3. For the underlying soil, while the frequency appears reasonable, EPA does not understand the initial sampling interval of 3-6". Clarification on this is requested.

As also noted in the proposed modification, additional sampling of the ACM pile (found to have PCBs > 1 ppm) will be conducted to determine waste management requirements/options, and the structural steel will be temporarily re-located to the northern portion of the pad pending a decision by the Town on waste disposal (e.g., decontamination, disposal as PCB bulk product waste, etc.). Information on both of these waste types and waste disposal will be submitted to EPA.

Should you have any questions on the above, please feel free to contact me.

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